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Gallatin City-County Health Department

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November 5, 2012

GPT/Custer Spur EIS
1100 112th Ave. NE, Suite 400
Bellevue, WA 98004

Re: Scoping Comments, GPT/Custer Spur EIS

To Whom It May Concern:

I am writing on behalf of the Board of Health of Gallatin County, Montana. We hereby request that the Army Corps of Engineers (ACE) prepare an area-wide ("programmatic") Environmental Impact Statement concerning coal transport from the Powder River Basin of Wyoming and Montana, through the Northwest to the potential new export facilities on the coast of Washington and Oregon. We understand that ACE already plans to examine the impacts of new ports; our request is to broaden the scope of the process to examine the entire transport corridors from the mines to the ports.

Should the increased coal export come about, the communities of Bozeman, Belgrade and Manhattan in Gallatin County through which trains pass will experience doubled (at least) train traffic. Several potential health and safety impacts to these communities have been brought to our attention. The Board does not have enough information to conclude that these impacts will be negligible, hence our request to examine them. We understand the particular issues to be examined will be identified during the scoping stage of the EIS. The Board's questions can be summarized for scoping as follows:

- How much coal dust is likely to blow off open coal cars in our towns, what are its characteristics and to what extent would it compromise the pulmonary and cardiovascular health of our citizens? Could buildup of coal dust within track ballast increase derailments along the transport corridors? While the loss of coal dust diminishes with distance from the mine mouth, at what point does it cease to be problematic? The potential emission and accumulation of coal dust in our communities raises concern.
- What other proximate air pollutants should be anticipated from, for example, locomotive exhaust emissions and auto traffic idling at blocked crossings? What would their effects be? Belgrade and Bozeman are both very close to becoming non-compliant with existing air quality standards. EPA's recent adoption of a more stringent standard for particulate air pollution pushes us even closer to non-compliance. The proposed increase in coal-train traffic will increase diesel exhaust emissions from moving trains, and auto exhaust emissions from blocked traffic. The Bozeman Rail Yard, where trains are attached to helper engines for their transit over the Bozeman Pass, will experience

greatly increased activity. What will be the air-quality impact on the residents adjacent to that facility?

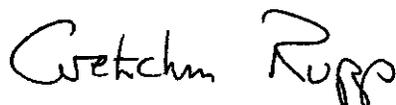
- Residents of Bozeman and Belgrade have expressed concern about a potential doubling (or more) in the number of delays experienced by emergency vehicles. Each unit coal train is between 1.1 and 1.5 miles in length, so these trains simultaneously close all three at-grade crossings in Bozeman, and, in Belgrade, all four at-grade crossings. This effectively blocks access to large parts of the cities and adjoining suburbs. A related issue was recently raised during community health working sessions by residents of Belgrade, who pointed out that their town is effectively “cut in two” by transportation corridors (rail and interstate highway). How would the passage of 3000+ rail cars per day through central Belgrade affect the quality of life there? The Board has no idea how to go about assessing this impact, but it’s clearly an important characteristic of the human community.
- A number of residents have expressed concern about noise pollution from trains in Gallatin County at the current level of traffic. The Board understands that frequent loud noise is not just an annoyance, but can be a health hazard. What kinds of health impacts from increased noise should we anticipate from the coal-export project? What can be done to mitigate these impacts?

We understand that preparation of a PEIS usually does not involve the collection of new data, but should there prove to be inadequate information to answer any of these questions, we ask that ACE consider generating new data. The questions for other communities along the coal-transport corridors are likely to be similar to those of Gallatin County. For this reason, we ask for a comprehensive, cumulative and connected analysis.

Please view the Gallatin City-County Board of Health and the Health Department as willing partners in any analysis activities, whether involving new or existing information. Our concern is to understand the magnitude and nature of project impacts, so that our communities can make plans and collaborate with the railroad to implement mitigation measures. Given how little we know now, we consider this the prudent and responsible course for a Board of Health.

You can contact me or Health Officer Matt Kelley at any time regarding our concerns and this letter. Thank you for your consideration.

Sincerely,



Gretchen Rupp, P.E.
Chair, Gallatin City-County Board of Health